

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

FARHAT ALI

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 4:22-CV-00036

(JURY)

DEFENDANT LIBERTY MUTUAL INSURANCE COMPANY'S
AMENDED MOTION TO ENTER FINAL JUDGMENT

COMES NOW, Defendant Liberty Mutual Insurance Company ("Liberty"), files this Amended Motion to Enter Final Judgment and in support thereof would show this Honorable Court the following:

1. This litigation arises from a hail and windstorm that caused damage to Plaintiff's property located in Harris County, Texas on or about April 28, 2020. (Doc 3, Ex A)
2. Defendant Liberty made an Offer of Judgment pursuant to Federal Rule of Civil Procedure 68 to Plaintiff Farhat Ali on September 12, 2022. (Doc 15)
3. Plaintiff Ali accepted the Offer of Judgment on September 28, 2022. (Doc 17)

Liberty Mutual respectfully requests the Court grant this Motion and sign and enter the Final Judgment, which is being contemporaneously filed herewith..

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By: /s/ J. Mark Kressenberg

J. Mark Kressenberg, Attorney in Charge

mkressenberg@thompsoncoe.com

Fed. Adm. No. 7793

Texas State Bar No. 11725900

Emmanuel I. Almaraz

ealmaraz@thompsoncoe.com

Fed. Adm. No. 3745214

Texas State Bar No. 24129089

One Riverway, Suite 1400

Houston, Texas 77056

Telephone: (713) 403-8399

**ATTORNEYS FOR DEFENDANT,
LIBERTY MUTUAL INSURANCE COMPANY**

CERTIFICATE OF CONFERENCE

I herby certify that I have confirmed Plaintiff is opposed to this motion by e-mail.

/s/ J. Mark Kressenberg

J. Mark Kressenberg

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 14, 2022, a true and correct copy of the foregoing instrument was served upon all known counsel of record in accordance with the Federal Rules of Civil Procedure, and any applicable Local Rules, as follows:

Chad T. Wilson
Donald C Green, II
Chad T. Wilson Law Firm PLLC
455 East Medical Center Blvd., Suite 555
Webster, Texas 77598

/s/ J. Mark Kressenberg

J. Mark Kressenberg